



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 7, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Ms. Pamela Faggert
Vice President & Chief Environmental Officer
Dominion Resources services
5000 Dominion Blvd.,
Glen Allen, Va. 23060

Dear Mr. Faggert,

On April 27, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Chesterfield Power Station. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Chesterfield Power Station and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Chesterfield Power Station is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Chesterfield Power Station. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by February 7, 2011. Please send your response to:

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-237
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

Enclosure 2
Chesterfield Power Station Recommendations

6.1. URGENT ACTION ITEMS

None of the recommendations are considered to be urgent, since the issues noted do not appear to threaten the structural integrity of the dam in the near term.

6.2. LONG TERM IMPROVEMENT

Lower Ash Pond

Measures should be implemented to improve the stability of the downstream slope of the western dike and bring the stability factors of safety up to accepted criteria for all loading conditions and failure modes. The stability improvements implemented should include a means to improve drainage and monitor seepage along the toe of western dike.

Additional maintenance recommendations are provided below:

- Paint metal components of outlet structure to control corrosion
- Use care when digging flow channels in accumulated ash to avoid undercutting/excavation into upstream slope of east dike
- Periodically remove accumulated sediment from embankment toe ditches and regrade to improve drainage of stormwater

Upper Ash Pond

In general, the Upper Ash Pond appeared to be in good condition. No major improvements to the Upper Ash Pond are recommended at this time.

Some minor maintenance recommendations are provided below:

- Place additional crushed stone road base in rutted or depressed areas along the crest. Regrade to prevent ponding of stormwater and further deterioration by truck traffic.
- Clean rust from metal components of decanting tower and repaint to maintain the structural members over the long term.
- Periodically remove accumulated sediment from toe ditches along south dike and regrade to improve drainage.

6.3. MONITORING AND FUTURE INSPECTION

O'Brien & Gere recommends that annual inspections by an engineer with experience in performance of dam safety inspections be continued in accordance with current practices.

Areas of saturation at the toe of slopes should be monitored for increases in flow rate and turbidity, which could indicate developing seepage problems.

We also recommend that quarterly inspections be performed along the toe of the Upper Ash Pond north dike to inspect for seepage due to a potential leak in the water line serving Henricus Park.

6.4 TIME FRAME FOR COMPLETION OF REPAIRS/IMPROVEMENTS

Stability improvement measures for the west dike of the Lower Ash Pond should be implemented within one year of the date of this final report. Maintenance items should be addressed within one year of this final report.